

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search Regarding No. 4:19-mj-70

19-112-04

**SEARCH AND SEIZURE WARRANT
"REDACTED"**

TO: ANY AUTHORIZED LAW ENFORCEMENT OFFICER

An application by a federal law enforcement officer or an attorney for the government requests the search of the property fully described in Attachment A, attached hereto and incorporated herein by reference.

I find that the affidavit, or any recorded testimony, establish probable cause to search and seize the property described above, and that such search will reveal evidence of the commission of criminal offenses, contraband, the fruits of crime, or things otherwise criminally possessed, or property designed or intended for use or which is or has been used as the means of committing criminal offenses, concerning violations of 18 U.S.C. § 1546(a), as fully described in Attachment B, attached hereto and incorporated herein by reference.

YOU ARE COMMANDED to execute this warrant on or before

10-21-19 (not to exceed 14 days)

☒ in the daytime - 6:00 a.m. to 10:00 p.m.

☐ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the undersigned Judge.

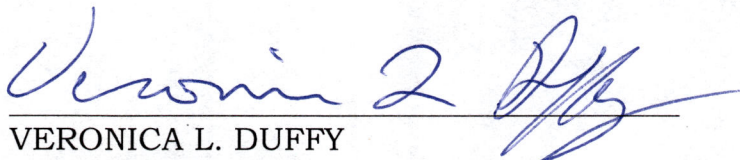
☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized,

☐ for _____ days (not to exceed 30).

CC: AUSA + Agent

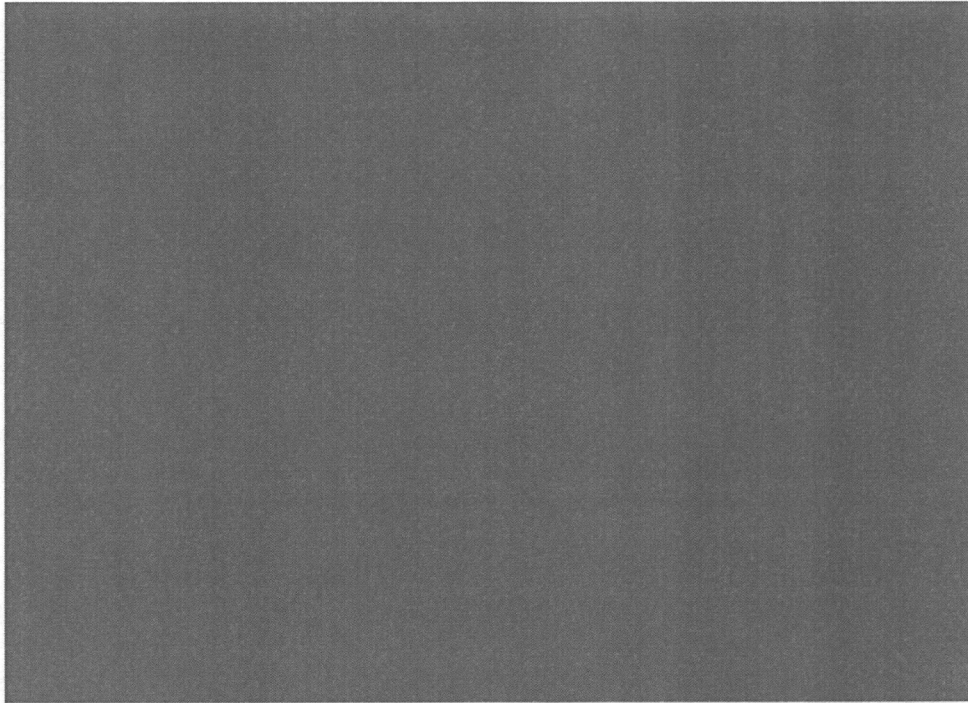
☐ until, the facts justifying, the later specific date of _____.

10-7-19 at 3:30pm CDT at Sioux Falls, South Dakota
Date and Time Issued

A handwritten signature in blue ink, appearing to read "Veronica L. Duffy", is written over a horizontal line.

VERONICA L. DUFFY
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A "REDACTED"
DESCRIPTION OF PROPERTY TO BE SEARCHED



1. [REDACTED], Flandreau, South Dakota, which is more particularly described as a [REDACTED]. The numbers "[REDACTED]" are affixed to the front of the residence.
2. Any garages, storage units or outbuildings that are associated with [REDACTED], Flandreau, South Dakota.
3. All vehicles on the property owned or operated by Jose DONIS-Gonzalez, to include Minnesota [REDACTED], a blue 2011 Chevrolet Malibu.
4. The person of Jose DONIS-Gonzalez, dob: [REDACTED].

**ATTACHMENT B “REDACTED”
DESCRIPTION OF PROPERTY TO BE SEARCHED FOR AND SEIZED**

1. All identity documents, foreign or domestic, to include but not limited to birth certificates, passports, identification cards, driver licenses or social security cards.
2. All immigration documents, to include but not limited to cards, receipts, correspondence or other papers.
3. All correspondence relating to the employment of Jose DONIS-Gonzalez, or other persons residing at target location.
4. All persons determined to be in the United States contrary to law.
5. All correspondence relating to the manufacture, sale and shipping of fraudulent documents.
6. All currency derived from the sale of fraudulent documents.
7. All cellular devices utilized by Jose DONIS-Gonzalez, to include all contents and electronically stored records relating to violations of 18 USC § 1546(a), including:
 - a) any information related to the employment;
 - b) lists of contacts and related identifying information;
 - c) types, amounts, and prices of fraudulent documents, as well as dates, places, and amounts of specific transactions;
 - d) any information related to sources of fraudulent documents, including names, addresses, phone numbers, or any other identifying information;
 - e) photographs and/or videos, in particular, photographs and/or videos of genuine documents, fraudulent documents, passport style head shots and co-conspirators.
 - f) Evidence of user attribution showing who used or owned the device at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

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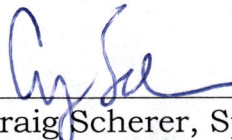
19-112-04

**APPLICATION FOR SEARCH AND
SEIZURE WARRANT "REDACTED"**

I, Craig Scherer, being duly sworn depose and say:

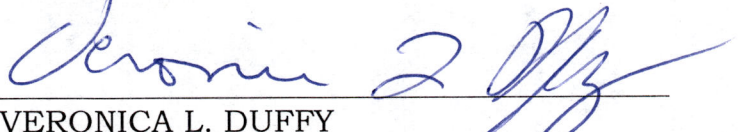
I am a Special Agent with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), and have reason to believe that within the property fully described in Attachment A, attached hereto and incorporated herein by reference, there is now concealed certain property, namely: that fully described in Attachment B, attached hereto and incorporated herein by reference, which I believe is property constituting evidence of the commission of criminal offenses, contraband, the fruits of crime, or things otherwise criminally possessed, or property designed or intended for use or which is or has been used as the means of committing criminal offenses, concerning violations of 18 U.S.C. § 1546(a).

The facts to support a finding of Probable Cause are contained in my Affidavit filed herewith.



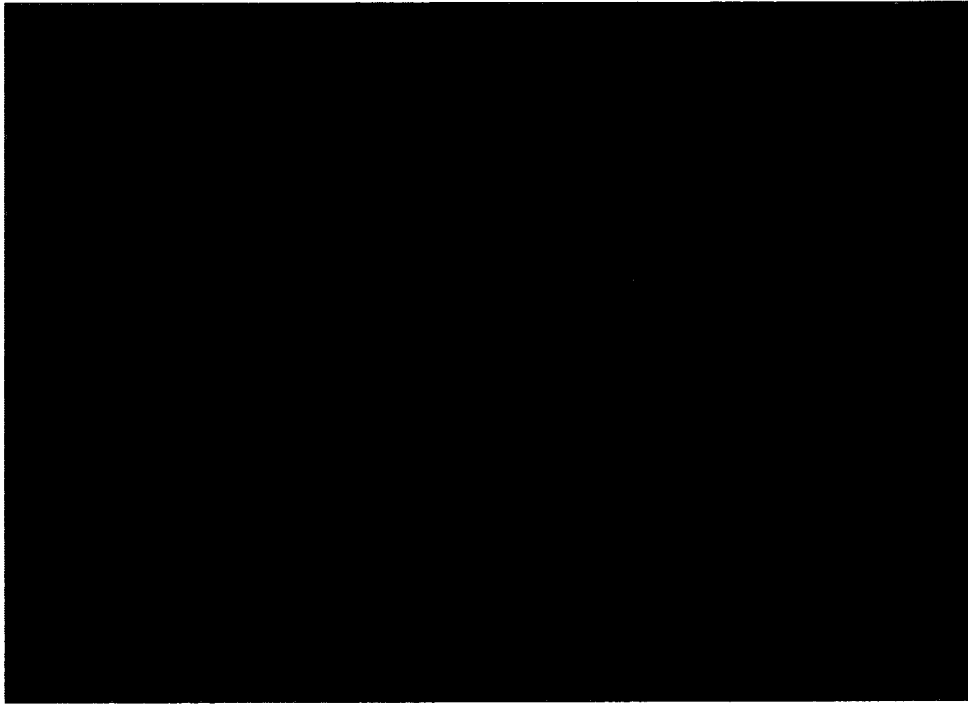
Craig Scherer, Special Agent
Homeland Security Investigations

Sworn to before me, and subscribed in my presence on the 7th day of October, 2019, at Sioux Falls, South Dakota.



VERONICA L. DUFFY
UNITED STATES MAGISTRATE JUDGE

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UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search of Regarding
19-112-04

No. 4:19-mj-70

**AFFIDAVIT IN SUPPORT OF
SEARCH AND SEIZURE WARRANT
"REDACTED"**

STATE OF SOUTH DAKOTA)
:SS
COUNTY OF MOODY)

I, Craig Scherer, being duly sworn on oath, depose and say:

1. I am a Special Agent with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), in Sioux Falls, South Dakota, and have been duly employed in this position since December 2003. I am a graduate of the Criminal Investigator Training Program and ICE Special Agent Training at the Federal Law Enforcement Training Center.

2. As a Special Agent, one of my responsibilities is conducting criminal and civil investigations of violations of the Immigration and Nationality Act, which relate to an alien's right to presence and employment in the United States.

3. Through this affidavit, I am requesting a search warrant be issued for 406 E. Pipestone Avenue, Flandreau, South Dakota (and any garages, storage units or outbuildings associated therewith), all vehicles on the property owned or operated by Jose DONIS-Gonzalez, to include Minnesota [REDACTED], a blue 2011 Chevrolet Malibu, and the person of Jose DONIS-Gonzalez, dob: [REDACTED].

4. I respectfully submit this affidavit in support of an application for a warrant to search for and seize instrumentalities, fruits, and evidence of violations of 18 USC § 1546(a) Possession or Use of Fraudulent Documents.

5. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that evidence of violations

of 18 USC § 1546(a) Possession or Use of Fraudulent Documents are located at the premises mentioned in this affidavit.

6. I have received information from other law enforcement officers and sources of information by either verbal or written report. The officers and sources providing information may have received the information by way of personal knowledge or from another source.

7. Through this investigation, Jose Ubaldo DONIS-Gonzalez was identified as a participant in a fraudulent document and human smuggling ring. On October 4, 2018, I conducted a debrief of a Source of Information (SOI) regarding a document vendor. The SOI has previously provided information leading to seizures and the arrests of numerous individuals. I deem the SOI reliable and trustworthy. The SOI provided information about [REDACTED]

8. On October 5, 2018, HSI Sioux Falls Confidential Informant SA-001-OF provided further information. SA-001-OF has previously provided information leading to seizures and the arrests of numerous individuals. I deem SA-001-OF reliable and trustworthy. [REDACTED]

9. On October 15, 2018, I received subpoena results from Verizon Wireless in reference to phone number [REDACTED]. The subscriber was identified as [REDACTED] of [REDACTED], Flandreau, SD. I conducted record queries for [REDACTED], which returned results for Jose DONIS-Gonzalez, dob: [REDACTED].

10. On March 6, 2019, I conducted a debrief of SA-001-OF [REDACTED]. SA-001-OF stated [REDACTED]

11. On March 20, 2019, I requested queries in U.S. Postal Service (USPS) records for the address [REDACTED], Flandreau, SD. Postal Inspection Service Inspector Derek Ryan advised this address has received fifty-seven (57) packages in the last year, with thirty-one (31) of those packages coming from California. Inspector Ryan further stated most of the California packages were between .12-.19lbs, which is suspected to be flat rate Priority mail envelopes.

12. On April 3, 2019, I instructed SA-001-OF

13. On March 27, 2019, South Dakota Division of Criminal Investigation SA Sam Kavanagh conducted a spot surveillance of target locations in Flandreau, SD. SA Kavanagh drove past [REDACTED], Flandreau, SD and observed DONIS' vehicle, Minnesota [REDACTED], parked in the driveway.

14. On April 9, 2019, I initiated the controlled purchase of fraudulent documents from DONIS. SA-001-OF [REDACTED]

15. On April 18, 2019, I conducted a debrief of SA-001-OF who advised [REDACTED]

16. On April 19, 2019, I received records from the USPS regarding two (2) mailings to [REDACTED], Flandreau, SD, the residence of DONIS. The first mailing was a Priority Mail 2-Day envelope containing USPS tracking number [REDACTED] and was addressed to [REDACTED], Flandreau, SD and listed a return address of [REDACTED] Cathedral City, CA. The shipping label listed an expected delivery date of 04/04/2019.

17. The second mailing was a Priority Mail 2-Day envelope containing USPS tracking number [REDACTED] and was addressed to [REDACTED], Flandreau, SD and listed a return address of [REDACTED], Cathedral City, CA. The shipping label listed an expected delivery date of 04/13/2019. The handwriting on the two mailings appeared to be generated from the same individual. The second mailing delivery date is consistent with the information DONIS provided to [REDACTED].

18. On April 22, 2019, I instructed SA-001-OF [REDACTED]

19. I subsequently instructed SA-001-OF [REDACTED]

20. On April 23, 2019, I received records from MoneyGram in response to a Summons. The records revealed an individual using the name Jose Ubaldo DONIS-Gonzalez, or combination thereof, dob: [REDACTED], sent thirty-one (31) wire transfers to [REDACTED], dob: [REDACTED], of [REDACTED], Palm Springs, CA, between 01/10/2018 and 04/11/2019, for a total amount of \$10,030. The wires were sent in even dollar amounts of \$150, \$300, \$400, \$450 and \$600. The identifiers for DONIS included:

- DOB: [REDACTED]
- Address: [REDACTED], Flandreau, SD
- Phone: [REDACTED]
- ID: [REDACTED]

21. On April 25, 2019, Inspector Ryan received notification via Postal business records that a Priority Mail parcel was mailed from Palm Springs, CA

to [REDACTED], Flandreau, SD. The parcel was addressed to [REDACTED], Flandreau, SD with a return address of [REDACTED], Cathedral City, CA. On April 30, 2019, Inspector Ryan applied for and received a federal search warrant to search the contents of the parcel. On May 1, 2019, Inspector Ryan searched the parcel, which contained five (5) permanent resident cards and four (4) Social Security cards.

22. I conducted record queries in DHS indices for these alien file numbers listed on the documents and noted none of alien file numbers and names listed on the suspect permanent resident cards matched DHS records. I also examined photos of the suspect Social Security cards and noted they appeared to be fraudulent.

23. [REDACTED]

24. [REDACTED]

25. [REDACTED]

26. [REDACTED]

[REDACTED]

27. SA-001-OF provided me with [REDACTED]

[REDACTED]

28. On May 31, 2019, the Brookings County Sheriff's Office (BCSO) conducted a traffic stop of a vehicle occupied by DONIS. The BCSO observed the suspect vehicle, a blue Chevy Malibu with paper plates, near Skyview Junction in Elkton, SD. The driver was identified by a California driver's license as Agustin DONIS-Alvarez, dob: [REDACTED] 1983, address of [REDACTED], Cathedral City, CA and phone of [REDACTED]. The passenger was identified by a Guatemala passport as Jose Ubaldo DONIS-Gonzalez, dob: [REDACTED], address [REDACTED], Flandreau, SD and phone of [REDACTED]. The VIN was identified as [REDACTED]. The BCSO stated DONIS identified the vehicle as belonging to him.

29. On or about June 26, 2019, DONIS moved out of [REDACTED], Flandreau, SD, to an unknown location.

30. On July 5, 2019, I queried law enforcement databases for VIN [REDACTED], a 2011 Chevy Malibu, known to be driven by DONIS. The query revealed this vehicle was assigned Minnesota license plate [REDACTED] and registered to Jose Ubaldo DONIS-Gonzalez, dob: [REDACTED], of [REDACTED], Flandreau, SD.

31. On July 5, 2019, I located DONIS' Chevy Malibu displaying Minnesota license plate [REDACTED] parked behind [REDACTED], Flandreau, SD, and attached a GPS tracker to the Malibu, pursuant to a state search warrant.

32. Between July 6, 2019, and July 7, 2019, the Malibu traveled from Flandreau, SD to San Antonio, TX and back to Flandreau, SD. I reviewed the GPS tracker data captured during this time. The following is a synopsis of the data:

33. 07/06/2019

- 0301 hours leaves 406 E. Pipestone Avenue, Flandreau, SD;
- 0310 hours travels southbound on I-29;
- 2022 hours arrives Home Depot, 2658 SW Military Drive, San Antonio, TX;
- 2055 hours leaves Home Depot;
- 2059 hours travels northbound on I-35;
- 2326 hours arrives Motel 6, 1005 Leander Road, Georgetown, TX;

34. 07/07/2019

- 0443 hours leaves Motel 6;
- 0448 hours travels northbound on I-35;
- 1830 hours Highway Patrol traffic stop on I-29 northbound near mile marker 26;
- 2030 hours arrives Tienda Salvadorena in Flandreau, SD;
- 2046 hours leaves Tienda Salvadorena;
- 2048 hours arrives 406 E. Pipestone Avenue, Flandreau, SD;

35. On July 7, 2019, South Dakota Highway Trooper Cody Jansen conducted a traffic stop of DONIS' Chevy Malibu displaying Minnesota driver's license plate [REDACTED] near I-29, mile marker 29.

36. Trooper Jansen identified the driver by Guatemala Passport as DONIS. DONIS stated he had driven to Sioux City, IA to pay off his vehicle loan and was returning home. DONIS stated the passenger was a friend who wanted to work at a dairy in South Dakota. DONIS further stated he picked the passenger up in a small town near Sioux City, IA. When Trooper Jensen asked DONIS what the passenger's name was, DONIS could not provide a name and stated DONIS had forgot.

37. Trooper Jensen approached the front seat passenger, who did not have any identification or speak English. The passenger identified himself as Enrique SANCHEZ-Garcia, dob: [REDACTED], by writing the information on a piece of paper.

38. DONIS consented to a search of the vehicle and, during the search, Trooper Jansen found a Permanent Resident card, number [REDACTED], in the name of [REDACTED], dob: [REDACTED] and a Social Security card, number [REDACTED], in the name [REDACTED] in a driver's side factory compartment. DONIS stated the identification belonged to DONIS' wife.

39. Trooper Jensen also observed several empty Red Bull drinks in the vehicle and both occupants were drinking Red Bull at the time of the stop. There were also empty fast food wrappers all over the car as well. It appeared to Trooper Jensen that DONIS and SANCHEZ has been traveling for a long

period of time. DONIS was cited for no driver's license and issued a warning for speeding. DONIS and SANCHEZ were released.

40. I conducted record checks in DHS indices for SANCHEZ and found no evidence of SANCHEZ being issued permission to enter, reside or work in the United States.

41. I conducted record checks in DHS indices for [REDACTED], which revealed this alien file number is assigned to a female from Pakistan.

42. On July 8, 2019, Inspector Ryan advised me of a search of U.S. Postal records for recent parcels originating from zip codes starting with "922" (Palm Springs, CA & Cathedral City, CA) identified one Priority Mail package delivered in Flandreau, SD on June 29, 2019. Inspector Ryan located an image of the package, which was a Priority Mail 2-Day envelope, weighing 3.1oz, containing USPS tracking number [REDACTED], addressed to Jose DONIS of [REDACTED], Flandreau, SD and listed a return address of [REDACTED], Cathedral City, CA. The shipping label listed an expected delivery date of 06/29/2019. The handwriting on the mailing appeared to be similar to other suspect mailings sent from these zip codes and a prior seized mailing.

43. On August 1, 2019, I provided SA-001-OF with

44.

45. On August 8, 2019, SA-001-OF

46. Upon arrival, I observed DONIS and an unknown passenger in DONIS' blue Malibu. [REDACTED]

[REDACTED]

47. I conducted record checks in DHS indices for [REDACTED], which returned to [REDACTED]. Record checks for [REDACTED] returned to [REDACTED].

48. On August 13, 2019, I received U.S. Postal records identifying two (2) Express Mail envelopes sent to DONIS' residence, located at [REDACTED], Flandreau, SD. The records included two (2) Priority Mail Express mailing labels. The first label was dated 08/02/2019, with tracking number [REDACTED]. The label was addressed to [REDACTED] of [REDACTED], Flandreau, SD, and telephone number [REDACTED]. The label listed a return address of [REDACTED], Lexington, KY, and telephone number [REDACTED]. The label listed a weight of 2.1oz and a scheduled delivery date of 08/05/2019.

49. The second label was dated 08/03/2019, with tracking number [REDACTED]. The label was addressed to [REDACTED] Avenue, Flandreau, SD, and telephone number [REDACTED]. The label listed a return address of [REDACTED], Lexington, KY, and telephone number [REDACTED]. The label listed no weight and a scheduled delivery date of 08/05/2019.

50. On September 12, 2019, I was notified by Inspector Ryan that a Priority Mail Express envelope was delivered to DONIS' residence, located at [REDACTED], Flandreau, SD. Inspector Ryan provided me with a copy of the mailing label. The envelope was mailed from Lexington, KY, on 09/10/2019, with postage in the amount of \$25.50. The return address listed [REDACTED], Lexington, KY, and was addressed to [REDACTED], Flandreau, SD. The envelope weighed 4.8oz and was delivered on 09/12/2019.

51. It is my experience that illegal aliens almost always maintain legally issued documents from their native country, such as passports, consular cards, cedula, and birth certificates, in a place that they consider secure and where they are readily accessible. Most frequently, these documents are kept within the privacy and security of their home. It is a common practice among illegal aliens to not carry their legally issued foreign documents on their person because they frequently use aliases.

52. It is my training and experience that illegal aliens purchase fraudulent identities to elude detection from law enforcement and obtain employment in the United States. I have investigated and arrested numerous illegal aliens for fraudulently assuming the identity of other persons and/or using the Social Security numbers of other individuals.

53. It is my training and experience that illegal aliens purchase fraudulent identities from criminal organizations involved with the manufacture and distribution of fraudulent documents. Illegal aliens seeking to purchase fraudulent documents commonly call or text the document vendor from their cellular phone to negotiate the purchase. Upon reaching an agreement the illegal alien requesting the fraudulent documents will send a photo of themselves and associated biographical information via text message to the document vendor.

54. It is my experience that illegal aliens who use fraudulent documents almost always maintain their fraudulent documents in a place that they consider secure and where they are readily accessible. Such persons rarely, if ever, dispose of their fraudulent documents after they have been used to secure employment. Most frequently, these documents are kept within the privacy and security of their home. This is a common practice among illegal aliens in order to avoid the confiscation of their fraudulent documents by law enforcement.

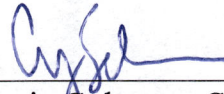
55. It is my experience that illegal aliens who utilize fraudulent documents commonly reside with other individuals who are illegally present in the United States, such as relatives, friends and co-workers. It is my experience that these cohabitants commonly possess and utilize fraudulent documents to obtain employment.

56. It is my training and experience that individuals involved with the manufacturing and sale of fraudulent documents commonly maintain, photographs, biographical information, ledgers, receipts and contact information, either in physical or electronic format.

57. I respectfully submit there is probable cause to believe that a search of the residence located at 406 E. Pipestone Avenue, Flandreau, South Dakota, more particularly described in Attachment A, will provide evidence regarding a violation of 18 USC § 1546(a), more particularly described in Attachment B.

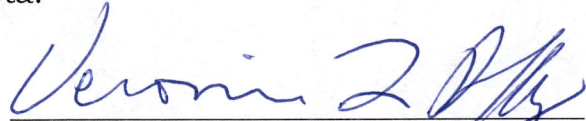
58. I respectfully request a search warrant be issued to search the residence at [REDACTED], Flandreau, South Dakota (And any garages, storage units or outbuildings associated therewith), all vehicles on the property owned or operated by Jose DONIS-Gonzalez, to include Minnesota [REDACTED], a blue 2011 Chevrolet Malibu, and the person of Jose DONIS-

Gonzalez, dob: [REDACTED], to search for evidence of the commission of a criminal offense, concerning violation of 18 USC § 1546(a).



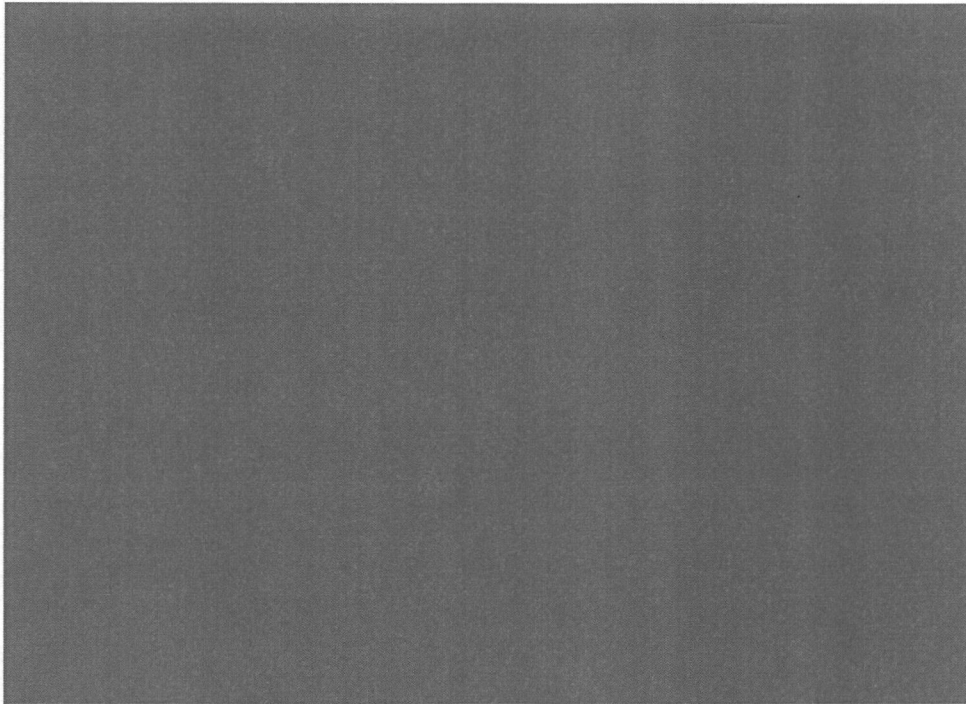
Craig Scherer, Special Agent
Homeland Security Investigations

Sworn to before me, and subscribed in my presence on the 7th day of
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VERONICA L. DUFFY
United States Magistrate Judge

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